

# EXHIBIT 1

NBHJSECH

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

23 Civ. 1346 (JSR)

TERRAFORM LABS PTE LTD., ET  
AL.,

Hearing

Defendants.

New York, N.Y.  
November 17, 2023  
2:00 p.m.

Before:

HON. JED S. RAKOFF,

District Judge

APPEARANCES

U.S. SECURITIES AND EXCHANGE COMMISSION  
Attorneys for Plaintiff  
BY: CHRISTOPHER J. CARNEY  
JAMES P. CONNOR  
LAURA E. MEEHAN

DENTONS US LLP  
Attorneys for Defendants Do Hyeong Kwon and Terraform Labs  
BY: DOUGLAS W. HENKIN  
LOUIS A. PELLEGRINO, III  
MARK CALIFANO  
MATTHEW A. LAFFERMAN  
DAVID L. KORNBLAU

Also Present:

Elliott Bacon, Katten Muchin Rosenman  
Sarah Gonzalez, Paralegal

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Unny - Direct

1 called as a witness by the Defendants,

2 having been duly sworn, testified as follows:

3 DIRECT EXAMINATION

4 BY THE COURT:

5 THE COURT: So again, thank you for being here.

6 I'm sure it's somewhere in your report -- it was in all  
7 the other reports, but I may have missed it somehow. How much  
8 are you being compensated for your expert work here?

9 THE WITNESS: Yes, your Honor.

10 As stated, in my first report, it's -- the  
11 compensation is \$950.

12 THE COURT: Oh, there it is. I now see it, \$950 an  
13 hour. Okay. Are you aware that some of the experts are  
14 getting even more and do you want a raise? You don't have to  
15 answer that.

16 So you heard the colloquy, and I guess one of the  
17 questions is, since you weren't personally doing the underlying  
18 processing of the data, what kind of supervision did you  
19 exercise and how did you exercise it?

20 THE WITNESS: Yes, your Honor.

21 So Cornerstone research is a data analytics company,  
22 and the data was provided to us with Mr. Edman's report and it  
23 was in a format called JSON. And so I had Cornerstone extract  
24 the data from the JSON data set and put it into a standardized  
25 SQL database. And then --

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1 THE COURT: What kind of data are we talking about?

2 THE WITNESS: There is the data that Mr. Edman was  
3 given by some consultant. He's not named, the consultant, but  
4 it was the data that was extracted, as I understand it, from  
5 Terra blockchain.

6 THE COURT: But that's part of my question. I  
7 understand what you just said, whether this was all the data,  
8 partial data, whether it was extracted through proper  
9 methodology or from skewed methodology, you just took it as  
10 given to you, yes?

11 THE WITNESS: I did verify the scripts that Dr. Edman  
12 provided in terms of how they extracted it. And there is a  
13 service called Terra Finder where you can query the Terra  
14 blockchain directly, and I did run a few queries to make sure  
15 the data was matching after we extracted it to the SQL  
16 database.

17 THE COURT: Now, did you limit yourself to Dr. Edman's  
18 data?

19 THE WITNESS: I tried to, your Honor, because that's  
20 the data that he uses to make his opinions.

21 THE COURT: And you concluded that it wasn't  
22 sufficient to substantiate his opinions; do I have that right?

23 THE WITNESS: Correct.

24 THE COURT: And so you're not saying his opinions are  
25 necessarily wrong, you're saying that you can't tell whether